

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

JESSICA JONES, et al.,

Plaintiffs,

v.

VARSITY BRANDS, LLC, et al.

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

JURY DEMAND

**DECLARATION OF JESSICA JONES IN SUPPORT OF PLAINTIFFS' MOTION FOR
CLASS CERTIFICATION**

I, Jessica Jones, declare the following under penalty of perjury:

1. I am over the age of eighteen and I am competent to make this declaration.

2. I respectfully submit this declaration in support of Plaintiff's Motion for Class

Certification. Each of the facts set forth below are true and correct and are within my personal knowledge. If called and sworn as a witness, I would competently testify thereto. As to matters of opinion and belief, I believe them to be true and accurate.

3. I am a resident of the State of Kansas.

4. I graduated from the University of Maryland with a Bachelor's degree in

Cognitive Science.

5. I am a parent of two competitive cheerleading athletes. Between the years of 2016 through 2020, my daughters participated in the sport of competitive cheerleading on teams run by All-Star gyms, including gyms in both Alabama and Kansas, due to our family's personal relocations. My daughters competed in regular and end-of season events, and their teams earned

bids to various end-of season events, including the U.S. Finals and NCA All-Star Nationals, held in Dallas, Texas. In 2020, certain events to which their teams had won bids were cancelled due to Covid-19.

6. Between the years 2016 to 2021, I purchased cheerleading apparel from Varsity.

7. I have never been a plaintiff in a class action lawsuit before deciding to serve as the proposed class representative in this case.

8. I am not being paid anything to be a named plaintiff, nor do I expect to receive anything in return for being a named plaintiff, nor have I been promised anything to serve as a named plaintiff. My main goal in serving as a class representative is only to serve the class and to seek the best possible result for all class members.

9. I am fully committed to the prosecution of this case, and will testify at trial, if necessary.

10. I reviewed the Complaint before it was filed. I also provided information to my attorneys to aid with the investigation of the case prior to filing the Complaint.

11. I provided my files and data to my attorneys to comply fully with discovery in this matter. It is my understanding that my counsel provided the responsive information to Defendants. I also reviewed the responses my counsel provided on my behalf to Defendants in response to Defendants' requests for documents and interrogatories.

12. I understand that as a class representative, I may be responsible for participating in giving notice to the classes if the class is certified and/or if there is a settlement or judgment and am willing to do so.

13. On February 10, 2022, I was deposed via Zoom by Defendants, and fully cooperated with my responsibilities to in giving my testimony. I estimate that I spent 15-20 hours preparing for and sitting for my deposition.

14. I reviewed the accompanying motion for class certification.

15. I have hired competent counsel and seek nothing other than to further the best interests of the class and to right this wrong and am fully willing to give my time and energy to do so through resolution.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 10, 2023 in Wichita, Kansas.

/s/ Jessica Jones
Jessica Jones

SIGNATURE ATTESTATION

I hereby attest that I have on file all holographic signatures corresponding to any signatures indicated by a conformed signature (/s/) within this e-filed document.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 10, 2023 in San Francisco, California.

By: /s/ Joseph R. Saveri
Joseph R. Saveri